

DENNIS L. KENNEDY  
Nevada Bar No. 1462  
PAUL C. WILLIAMS  
Nevada Bar No. 12524  
**BAILEY❖KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
DKennedy@BaileyKennedy.com  
PWilliams@BaileyKennedy.com

DONNA M. CONNOLLY  
New Mexico Bar No. NM 9202  
(Admitted Pro Hac Vice)  
RICHARD W. HUGHES  
New Mexico Bar No. NM 1230  
(Admitted Pro Hac Vice)  
**ROTHSTEIN DONATELLI LLP**  
1215 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone: 505.988.8004  
Facsimile: 505.982.0307  
[DConnolly@RothsteinLaw.com](mailto:DConnolly@RothsteinLaw.com)  
[RWHughes@RothsteinLaw.com](mailto:RWHughes@RothsteinLaw.com)

*Attorneys for Defendants Ahmad Razaghi  
Razaghi Development Company, LLC  
Razaghi Healthcare, LLC; and  
Razaghi Healthcare LLC (Arizona)*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

KORY RAZAGHI,

Plaintiff,

vs.

AHMAD RAZAGHI; MANUEL MORGAN;  
MORGAN & RAZAGHI HEALTHCARE,  
LLC; RAZAGHI HEALTHCARE, LLC;  
RAZAGHI DEVELOPMENT COMPANY,  
LLC; and DOES I through X, ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:18-cv-01622-GMN-CWH

**STIPULATION TO STAY OF  
CERTAIN DISCOVERY**

Plaintiff and Defendants Ahmad Razaghi (“Ahmad”), Razaghi Development Company, LLC  
 (“RDC”), Razaghi Healthcare, LLC (“Razaghi Healthcare NV”), and Razaghi Healthcare, LLC

(Arizona) (collectively, the “Ahmad Defendants”) hereby stipulate and agree as follows:

1. All discovery as between the Plaintiff and the Ahmad Defendants will be stayed for a period of three months from the date hereof (the “Stay”) (the end date of which period is referred to herein as the “Stay Termination Date”), except that Plaintiff may take the deposition of Ahmad Razaghi on April 22, 2019, in Tempe, Arizona. However, Plaintiff reserves the right to recall Ahmad Razaghi as a deponent, if Plaintiff has not received the documents responsive to the subpoena he issued to Sage Memorial by April 22, 2019.
2. If the Court has not ruled on the Ahmad Defendants’ pending Motion to Dismiss Plaintiff’s Second Amended Complaint, ECF No. 72) (the “Motion to Dismiss”) by the Stay Termination Date, discovery may resume as between Plaintiff and the Ahmad Defendants, but only for a period of sixty (60) days, unless further extended by order of the Court (via stipulation or motion to extend discovery); and Plaintiff may file during such sixty-day period any motion to compel discovery he deems warranted by discovery responses provided by the Ahmad Defendants prior to the date of this Stipulation.
3. If, during the Stay the Court grants the Motion to Dismiss, but only in part, discovery may resume between Plaintiff and the Ahmad Defendants, but only relative to issues that remain in the case following such ruling, and only for a period of sixty (60) days following the date of such ruling, unless further extended by order of the Court.
4. During the Stay, Plaintiff and the Ahmad Defendants may engage in discovery from third parties; but provided that any documents produced by any third parties to either Plaintiff or to the Ahmad Defendants shall be shared promptly with the other party without the need for a request to produce.
5. The Stay shall not apply to briefing or a ruling by the Court on Plaintiff’s pending Motion to Alter or Amend or Reconsider Magistrate Judge’s Protective Order (ECF No. 83) or Plaintiff’s Objection to Magistrate Judge Order ECF No. 81 (ECF No. 86).
6. The dates previously established herein for dispositive motions and submission of a joint pre-trial order should be vacated, and would be reset by the Court following the Court’s ruling on the Motion to Dismiss, if necessary, or following the Stay Termination Date, if

no such ruling has been issued by then.

Dated this 25<sup>th</sup> day of March, 2019.

BAILEY ❖ KENNEDY

MARQUIS AURBACH COFFING

By: /s/ Paul C. Williams  
DENNIS L. KENNEDY  
PAUL C. WILLIAMS

By: /s/ Jonathan B. Lee  
PHILLIP S. AURBACH  
JOHNATHAN B. LEE  
*Attorneys for Kory Razaghi*

ROTHSTEIN DONATELLI LLP  
DONNA M. CONNOLLY  
RICHARD W. HUGHES  
*Attorneys for Ahmad Defendants*

**ORDER**

IT IS SO ORDERED, this 27 day of March, 2019.

  
\_\_\_\_\_  
United States Magistrate Judge